

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

MAYAR ZOKAEI, §
PLAINTIFF, §
§
V. § CIVIL ACTION NO. 5:20-cv-00775
§ (JURY TRIAL DEMANDED)
FUNDAMENTAL SPORTS MANAGEMENT, LLC; §
ROE-BRG INVESTMENTS, LLC; RAHUL PATEL; §
GRANT GAINES; AND NICOLAS LAHOOD, §
DEFENDANTS. §

DEFENDANTS' NOTICE OF REMOVAL

TO THE HON. U.S. DISTRICT JUDGE OF SAID COURT:

COME NOW Defendants Fundamental Sports Management, LLC; ROE-BRG Investments, LLC; Rahul Patel; Grant Gaines; and Nicolas Lahood (collectively, “**Defendants**”) and file their Notice of Removal, respectfully showing the Court as follows:

I. Statement of Case

1. On June 29, 2020, Mayar Zokaei (“**Plaintiff**”) filed suit against Defendants in the 285th Judicial District Court of Bexar County, Texas, under Cause No. 2020 CI11759. A true and correct copy of the docket sheet and the only document filed in this lawsuit (i.e., the original petition) are attached hereto as Exhibits A and B. Among other causes of action, Plaintiff seeks recovery against Defendants under the Fair Labor Standards Act of 1938, 29 U.S.C. §§ 201, *et seq.* (“**FLSA**”).

II. Basis for Removal

2. This Court has jurisdiction over this removed action under the provisions of 28 U.S.C. § 1331 because Plaintiff seeks recovery under the FLSA. 28 U.S.C. § 1441. Removal to

the Western District of Texas, San Antonio Division is proper because the state court lawsuit is pending in Bexar County, Texas

III. Removal is Timely Filed

3. None of Defendants have been served with process in connection with the state court lawsuit. Therefore, the deadline for removal has not yet begun to run. In any event, Plaintiff only commenced the state court lawsuit on June 29, 2020, and thus this notice of removal is timely filed.

IV. Cover Sheets

4. Pursuant to 28 U.S.C. § 1446(a) and Local Rule CV-3, Defendants attach to this Notice of Removal their Civil Cover Sheet and Supplement to JS 44 Civil Cover Sheet (Cases Removed from State District Court). Defendants have not been served any process, pleadings, or orders at this time.

V. Joinder by All Defendants

5. None of Defendants have been served. However, all Defendants join in and consent to this removal.

VI. Related Case

6. This removed case is related to that civil action styled and numbered Fundamental Sports Management, LLC, et al. v. Zokaei; Civil Action No. 5:20-cv-00774; in the United States District Court for the Western District of Texas, San Antonio Division.

VII. Jury Demand

7. Defendants respectfully demand a trial by jury.

VIII. Prayer

WHEREFORE, PREMISES CONSIDERED, Defendants file this notice to remove the state court lawsuit to this Court.

Respectfully submitted,

PATEL GAINES, PLLC
221 West Exchange Ave., Suite 206A
Fort Worth, Texas 76164
www.patelgaines.com
(817) 394-4844 | Telephone
(817) 394-4344 | Facsimile

By: /s/ Lance H. “Luke” Beshara
Lance “Luke” H. Beshara
Texas State Bar No. 24045492
lbeshara@patelgaines.com

ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify that on or before the date this document was filed with the Clerk of the Court, a true and correct copy was transmitted in accordance with the requirements of the Federal Rules of Civil Procedure, addressed as follows:

Via ECF Service or Email:

Husein Hadi
7100 Regency Square Blvd., Suite 140
Houston, Texas 77036

/s/ Lance H. “Luke” Beshara
Lance H. “Luke” Beshara

EXHIBIT A



COUNTY CLERK & DISTRICT CLERK
COURT RECORDS SEARCH

Case #2020CI11759

Name:

Date Filed : 6/29/2020

Case Status : PENDING

Litigant Type : DEFENDANT

Court : 285

Docket Type : EMPLOYMENT-TERMINATION

Business Name : 2020CI11759

Style : MAYAR ZOKACI

Style (2) : vs FUNDAMENTAL SPORTS MANAGEMENT LLC ET AL

Case History

Currently viewing all records

Sequence	Date Filed	Description
P00001	6/29/2020	PETITION

EXHIBIT B

CAUSE NO. 2020CI11759

MAYAR ZOKAEI § **IN THE DISTRICT COURT**
Plaintiff, §
§
v. § **285TH JUDICIAL DISTRICT**
§
FUNDAMENTAL SPORTS §
MANAGEMENT, LLC, ROE-BRG §
INVESTMENTS, LLC, RAHUL §
PATEL, GRANT GAINES, and § **OF BEXAR COUNTY, TEXAS**
NICOLAS LAHOOD §
Defendants. §

PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURES

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Mayar Zokaei ("Plaintiff") and files this, Plaintiff's Original Petition, complaining of Defendants Fundamental Sports Management, LLC (FSM), ROE-BRG Investments, LLC, Rahul Patel, Grant Gaines, and Nicolas Lahood ("Defendants"), and for cause of action, Plaintiff would respectfully show this Honorable Court the following:

DISCOVERY CONTROL PLAN

1. Plaintiff affirmatively pleads that he seeks monetary relief of \$200,000.00 to \$1,000,000.00, including damages of any kind, penalties, costs, expenses, pre-judgment interest and attorney fees and intends that discovery be conducted under Discovery Level 3.

PARTIES

2. Plaintiff, MAYAR ZOKAEI, is an individual residing in Wilsonville, Oregon.

3. Defendant, FUNDAMENTAL SPORTS MANAGEMENT, LLC ("FSM"), a Texas limited liability company, may be served pursuant to article 2.11(A) of the TEXAS BUSINESS CORPORATIONS ACT, or its successor statutes, sections 5.201 and 5.255 of the TEXAS BUSINESS ORGANIZATIONS CODE, by serving its registered agent Patel Gaines, at 2030 North Loop 1604

West, Suite 200, San Antonio, Texas 78248. Service of said Defendant as described herein may be effected by personal delivery.

4. Defendant, ROE-BRG Investments, LLC, a Texas limited liability company, may be served pursuant to article 2.11(A) of the TEXAS BUSINESS CORPORATIONS ACT, or its successor statutes, sections 5.201 and 5.255 of the TEXAS BUSINESS ORGANIZATIONS CODE, by serving its registered agent Grant M Gaines, at 14414 Blanco Road, Suite 320, San Antonio, Texas 78216. Service of said Defendant as described herein may be effected by personal delivery.

5. Defendant, Rahul Patel, is an individual residing in Bexar County, Texas who may be served with process at his place of business located at 2030 North Loop 1604 West, Suite 200, San Antonio, Texas 78248. Service of said Defendant as described above can be affected by personal delivery.

6. Defendant, Grant Gaines, is an individual residing in Bexar County, Texas who may be served with process at his place of business located at 2030 North Loop 1604 West, Suite 200, San Antonio, Texas 78248. Service of said Defendant as described above can be affected by personal delivery.

7. Defendant, Nicolas Lahood, is an individual residing in Bexar County, Texas who may be served with process at his place of business located at 14414 Blanco Road, Suite 320, San Antonio, Texas 78216. Service of said Defendant as described above can be affected by personal delivery.

JURISDICTION AND VENUE

8. The subject matter in controversy is within the jurisdictional limits of this court.

9. This court has jurisdiction over the parties because Defendants Rahul Patel, Grant Gaines, and Nicolas Lahood residents of the state of Texas.

10. Venue in Bexar County is proper in this cause under Section 15.002(a)(1) of the Texas Civil Practice and Remedies Code because all or a substantial part of the events or omissions giving rise to this lawsuit occurred in this county.

FACTS

11. Plaintiff began working for FSM on or about February 1, 2020. Plaintiff and Defendants' employment contract provided that Plaintiff was hired for a one-year duration. The agreement also provided that Plaintiff would be reimbursed for the expenses he incurred while fulfilling his employment duties. Plaintiff was hired to perform services for FSM under the managing members' direction and control, which meant that Plaintiff did as directed. Defendants Fundamental Sports Management, LLC (FSM), ROE-BRG Investments, LLC, Rahul Patel, Grant Gaines, and Nicolas Lahood specialize in NBA agent representations, sports marketing, brand development, legal representation, contract negotiation, and endorsements. According to its public website, FSM focuses on media, marketing, and management.

12. FSM has been extremely successfully, paying some its executive six figure salaries, making it a reasonable inference that FSM's total revenue exceed \$500,000.00. Furthermore, FSM has agents and employees throughout the United States, which undoubtably shows they are engaged in interstate commerce.

13. As the managing members of FMS, Defendants ROE-BRG Investments, LLC, Rahul Patel, Grant Gaines, and Nicolas Lahood exercised control over and supervision of Plaintiff's job duties. FSM employs more than 2 employees to manage its operations.

14. On or about April 20, 2020, Plaintiff was wrongfully terminated by FSM. Defendants' did not pay Plaintiff for the time he worked for period ending in April. Furthermore,

Defendants did not reimburse Plaintiff for the expenses he incurred during his employment with Defendants.

15. The FLSA was enacted to correct and eliminate “labor conditions detrimental to the maintenance of the minimum standard of living necessary for health, efficacy and general well-being of workers” 29 U.S.C. § 202. Towards this end, the FLSA set employment related requirements, including requirement to timely pay for work performed. 29 CFR § 790.21.

16. Defendants did not pay Plaintiff for the work he had already performed as required by 29 CFR § 790.21. Defendants knew or reasonably should have known that Plaintiff was not exempt from the provisions of the FLSA. Defendants knew or showed reckless disregard for whether its pay practices violated the FLSA.

17. Furthermore, Defendants knew that they had an employment contract with Plaintiff for the term of one year. Defendants knew that they could not terminate Plaintiff’s contract without cause. Nevertheless, Defendant’s wrongfully terminated Plaintiff.

**FIRST CAUSE OF ACTION: BREACH OF CONTRACT ACTION FOR
WRONGFUL TERMINATION OF EMPLOYMENT.**

18. Plaintiff hereby incorporates all preceding paragraphs as if fully set forth herein.

19. Plaintiff brings this claim pursuant to *Lee-Wright, Inc. v. Hall*, 840 S.W.2d 572 (Tex. App.—Houston [1st Dist.] 1992).

20. Plaintiff’s written employment contract provided that Plaintiff would be employed for a term of one year. Plaintiff performed the duties he was hired to perform. Nevertheless, Defendants wrongfully terminated him without cause prior to the end of the term of the contract.

21. Defendants’ actions constitute a breach of contract for wrongful termination.

SECOND CAUSE OF ACTION: BREACH OF CONTRACT ACTION

22. Plaintiff hereby incorporates all preceding paragraphs as if fully set forth herein.

23. Plaintiff brings this claim pursuant to *Paragon Gen. Contractors, Inc. v. Larco Constr., Inc.*, 227 S.W.3d 876, 882 (Tex. App.--Dallas 2007, no pet.)

24. Plaintiff had a contract with Defendants. As part of that contract Defendants were supposed to reimburse Plaintiff for the expenses he incurred while performing his job duties for Defendants. Plaintiff incurred expenses and timely presented those expenses to Defendants. Defendants have refused to reimburse Plaintiff for the expenses he has incurred.

25. Defendants' actions constitute a breach of contract.

THIRD CAUSE OF ACTION: FAILURE TO PAY WAGES IN VIOLATION OF THE FLSA

26. Plaintiff hereby incorporates all preceding paragraphs as if fully set forth herein.

27. Plaintiff brings this claim pursuant to 29 CFR § 790.21.

28. During his employment for Defendants, Plaintiff was an employee who was not exempt from payment of wages provisions of the FLSA. While Plaintiff was employed by FSM and under the direction of the managing members, Plaintiff and/or Defendants were engaged in interstate commerce.

29. Plaintiff pleads both individual and enterprise coverage under the FLSA.

30. As a nonexempt employee, Defendants were required to pay Plaintiff at the end of the pay period. 29 CFR § 790.21.

31. Defendants did not pay Plaintiff the wages he was due.

32. Defendants knew or showed reckless disregard for whether their pay practices violated the FLSA. In other words, Defendants willfully violated provisions of the FLSA.

33. To the extent Defendants violated other employment laws in connection with its employment of Plaintiff and the matters described herein, including FLSA retaliation, Plaintiff reserves the right to file appropriate charges or claims in this case or other venues as necessary.

DAMAGES

34. Plaintiff hereby incorporates all preceding paragraphs as if fully set forth herein.
35. Under the Fair Labor Standards Act, Plaintiff is entitled to relief, including, but not limited to, payment of unpaid wages and an additional equal amount as liquidated damages. *See* 29 U.S.C. § 216(b).
36. Plaintiff is entitled to the actual damages resulting from Defendants' breach of contract.
37. Plaintiff is also entitled to all appropriate legal and equitable relief available under the common law, including recovery for non-pecuniary losses, such as pain and suffering.
38. Plaintiff is also entitled to an award of attorney's fees and costs under 29 U.S.C. § 216(b) and Tex. Civ. Prac. & Rem. Code § 38.001.

NOTICE OF USE

39. Pursuant to Rule 193.7 of the Texas Rules of Civil Procedure, Defendants are hereby notified that Plaintiffs intends to use all documents produced by Defendants in response to written discovery in pretrial proceedings and trial. Defendants are required to assert any objection to the authenticity of any document Defendants produces within ten days of its production.

REQUEST FOR DISCLOSURES

40. Pursuant to Rule 194 of the Texas Rules of Civil Procedure, Plaintiff requests that each and every Defendant disclose, within fifty (50) days of service of this request, the information and material described in Rule 194.2(a) through (l).

DESIGNATED E-SERVICE EMAIL ADDRESS

41. The following is the undersigned attorney's designated e-Service email address for all e- served documents and notices, filed and unfiled, pursuant to Tex. R. Civ. P. 21(f)(2) & 21a:

Litigation@TheHadiLawFirm.com. This is the undersigned's only e-Service email address, and service through any other email address will be considered invalid.

REQUEST FOR DEPOSITION DATES

42. Pursuant to Rule 199 of the Texas Rules of Civil Procedure, Plaintiff request that each and every Defendant disclose, within fifty (50) days of service of this request, dates that Defendant is available for Plaintiff to take Defendant's deposition. Plaintiff request that each corporate Defendant provide dates that Defendant's corporate representative is available for Plaintiff to take Defendant's corporate representative's deposition.

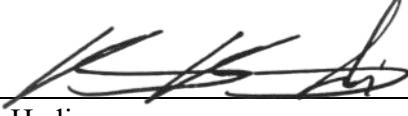
PRAYER

43. WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully prays that he have and recover judgment in his favor against Defendants Fundamental Sports Management, LLC, ROE-BRG Investments, LLC, Rahul Patel, Grant Gaines, and Nicolas Lahood for the following:

- a. All unpaid wages and expense reimbursements;
- b. an additional amount equal to Plaintiff's unpaid wages and expenses as liquidated damages pursuant to statute;
- c. all other forms of relief available to Plaintiff under the FLSA and the common law;
- d. reasonable attorney's fees for this action and for any and all appeals in this matter;
- e. pre- and post-judgment interest as allowed by law;
- f. costs of court for prosecuting Plaintiff's claim; and
- g. such other and further relief to which Plaintiff may be justly entitled.

Respectfully submitted,

THE HADI LAW FIRM, PLLC

By: 
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Texas Bar No. 24067641
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Texas Bar No. 24066914
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litigation@thehadilawfirm.com
Attorneys for Plaintiff

PLAINTIFF HEREBY DEMANDS TRIAL BY JURY

DATE FILED: June 26, 2020

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Mayar Zokael

DEFENDANTS

Fundamental Sports Management, LLC; ROE-BRG Investments, LLC; Rahul Patel; Grant Gaines; and Nicolas Lahood

(b) County of Residence of First Listed Plaintiff Clackamas County, OR
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Bexar County, TX

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)
Husein Hadi / The Hadi Law Firm, PLLC
7100 Regency Square Boulevard, Suite 140, Houston, Texas 777036
(832) 433-7977

Attorneys (If Known)
Lance H. "Luke" Beshara / Patel Gaines, PLLC
2030 N. Loop 1604 W, Suite 200, San Antonio, Texas 78248
(210) 460-7787

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

<input type="checkbox"/> 1 U.S. Government Plaintiff	<input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)
<input type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)
(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	PERSONAL INJURY	PERSONAL INJURY	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability		<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 330 Federal Employers' Liability		<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability		<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability	PERSONAL PROPERTY		<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 460 Deportation	
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations	
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 480 Consumer Credit	
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 490 Cable/Sat TV	
<input type="checkbox"/> 195 Contract Product Liability			<input type="checkbox"/> 820 Copyrights	
<input type="checkbox"/> 196 Franchise			<input type="checkbox"/> 830 Patent	
REAL PROPERTY	CIVIL RIGHTS	HABEAS CORPUS:	<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application	
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 840 Trademark	
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 510 Motions to Vacate Sentence		<input type="checkbox"/> 377 False Claims Act
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 530 General		<input type="checkbox"/> 378 RICO
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 535 Death Penalty		<input type="checkbox"/> 379 False Claims Act
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	OTHER:		<input type="checkbox"/> 380 False Claims Act
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	<input type="checkbox"/> 540 Mandamus & Other		<input type="checkbox"/> 381 False Claims Act
	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 550 Civil Rights		<input type="checkbox"/> 382 False Claims Act
		<input type="checkbox"/> 555 Prison Condition		<input type="checkbox"/> 383 False Claims Act
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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
San Antonio DIVISION

Supplement to JS 44 Civil Cover Sheet
Cases Removed from State District Court

This form must be filed with the Clerk's Office no later than the **first business day** following the filing of the Notice of Removal. Additional sheets may be used as necessary.

The attorney of record for the removing party **MUST** sign this form.

STATE COURT INFORMATION:

1. Please identify the court from which the case is being removed; the case number; and the complete style of the case.

285th Judicial District Court of Bexar County, Texas; Cause Number: 2020CI11759; Zokaei v. Fundamental Sports Management, LLC, et al.

2. Was jury demand made in State Court? Yes No

If yes, by which party and on what date?

Plaintiff 6/29/2020

Party Name Date

STATE COURT INFORMATION:

1. List all plaintiffs, defendants, and intervenors still remaining in the case. Also, please list the attorney(s) of record for each party named and include the attorney's firm name, correct mailing address, telephone number, and fax number (including area codes).

Plaintiff: Mayar Zokaei

Plaintiff's attorney information: see ADDITIONAL COMMENTS

Defendants: Fundamental Sports Management, LLC; ROE-BRG Investments, LLC; Rahul Patel; Grant Gaines; and Nicolas Lahood

Defendants' attorney information: see ADDITIONAL COMMENTS

2. List all parties that have not been served at the time of the removal, and the reason(s) for non-service.

None of Defendants have been served. It is unknown why Plaintiffs have failed to request citation or serve Defendants.

3. List all parties that have been non-suited, dismissed, or terminated, and the reason(s) for their removal from the case.

n/a

COUNTERCLAIMS, CROSS-CLAIMS, and/or THIRD-PARTY CLAIMS:

1. List separately each counterclaim, cross-claim, or third-party claim still remaining in the case and designate the nature of each such claim. For each counterclaim, cross-claim, or third-party claim, include all plaintiffs, defendants, and intervenors still remaining in the case. Also, please list the attorney(s) of record for each party named and include the attorney's firm name, correct mailing address, telephone number, and fax number (including area codes).

None at this time.

VERIFICATION:

/s/ Lance H. "Luke" Beshara 7/3/2020
Attorney for Removing Party Date

Defendants

Party/Parties

(NOTE: Additional comment space is available on page 3)

ADDITIONAL COMMENTS (As necessary):

Plaintiff's Attorney:

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Fax: (855) 423-4529

Defendants' Attorney:

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San Antonio, Texas 78248
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Fax: (210) 460-7797